

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: Tamekia Jackson  
Debtor(s)**

**Case No.: 22-10137—JDW  
Chapter: 13  
Judge: Jason D. Woodard**

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**OBJECTION TO CHAPTER 13 PLAN and MOTION FOR LIEN AVOIDANCE**

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COMES NOW, judgment creditor JSM Oxford Properties, LLC, in objection to section 3.4 “Motion to avoid lien pursuant to 11 U.S.C. § 522” of Debtor’s “Chapter 13 Plan and Motions for Valuation and Lien Avoidance” stating the following, to-wit:

1. Debtor claims that the Default Judgment against Tamekia Jackson and Full Potential Adult Daycare III, jointly and severally, dated February 25, 2020, recorded in the judgment rolls of the Lafayette County Circuit Clerk on February 25, 2020, at 3:36 p.m. in minute book CVMB page 4147, bearing file number 37558, also recorded with the Circuit Courts of Panola and DeSoto counties pursuant to law, will impair exemptions to which the Debtor would have been entitled under 11 U.S.C. § 522(b) and therefore moves the Court to avoid the judgment lien in its entirety and treat the judgment as a completely unsecured claim.
2. Debtor does not explain or cite specifically which of the many exemption(s) under 11 U.S. Code § 522(b) would be impaired, nor does Debtor explain how or why the entirety of the judgment lien should be avoided. Debtor did not provide: the property subject to the lien and its fair market value; the amount, listed separately, of all mortgages and other liens on the property which the Debtor will not seek to avoid, and a list of the liens on the property which the Debtor will seek to avoid; the amount of the exemption to which the

Debtor would be entitled but for the lien; or the common address and legal description of the real estate, if any, for which Debtor seeks to avoid a judicial lien.

3. In fact, Debtor's motion describes the "Property subject to lien" as "Judicial lien." That is the nature of the lien, not the nature or description of the property subject to the lien.
4. Creditor's counsel contacted Debtor's counsel via phone for further information but the call was not returned.

WHEREFORE, PREMISES CONSIDERED, Creditor JSM Oxford Properties, LLC prays that Debtor's request for lien avoidance be denied and that it be awarded all other relief appropriate in the premises.

JSM OXFORD PROPERTIES, LLC

/s/ Reed Martz  
M. Reed Martz, MS Bar 101443

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**Certificate of Service**

I hereby certify that on October 26, 2022, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all registered parties including Debtor's counsel, Catherine Umberger, [cu@mayfieldlawfirm.com](mailto:cu@mayfieldlawfirm.com).

I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants: None.

/s/ M. Reed Martz, MS Bar 101443